

1 KAMALA D. HARRIS  
Attorney General of California  
2 DIANN SOKOLOFF  
Supervising Deputy Attorney General  
3 CAROL ROMEO  
Deputy Attorney General  
4 State Bar No. 124910  
1515 Clay Street, 20th Floor  
5 P.O. Box 70550  
Oakland, CA 94612-0550  
6 Telephone: (510) 622-2141  
Facsimile: (510) 622-2270  
7 *Attorneys for Complainant*

**FILED**

Board of Vocational Nursing  
and Psychiatric Technicians

8 **BEFORE THE**  
9 **BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 **In the Matter of the Petition to Revoke**  
13 **Probation Against:**

Case No. VN-2006-1606

14 JUANITA BUITRAGO  
775 Sweeny Street  
San Francisco, CA 94136

PETITION TO REVOKE PROBATION

15 Vocational Nurse No. VN 147359

Respondent.

16  
17 Complainant alleges:

18 PARTIES

19 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Petition to Revoke  
20 Probation solely in her official capacity as the Executive Officer of the Board of Vocational  
21 Nursing and Psychiatric Technicians, Department of Consumer Affairs.

22 2. On or about January 30, 1990, the Board of Vocational Nursing and Psychiatric  
23 Technicians issued Vocational Nurse Number VN 147359 to Juanita Buitrago (Respondent). The  
24 Vocational Nurse License was in effect at all times relevant to the charges brought in this Petition  
25 to Revoke Probation and will expire on November 30, 2011, unless renewed.

26 3. In a disciplinary action entitled "In the Matter of Accusation Against: Juanita  
27 Buitrago " Case No. VN-2006-1606, the Board of Vocational Nursing and Psychiatric  
28 Technicians, issued a decision, effective September 27, 2008, in which Respondent's Vocational

1 Nurse License was revoked. However, the revocation was stayed and Respondent's Vocational  
2 Nurse License was placed on probation for a period of three (3) years with certain terms and  
3 conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

#### 4 JURISDICTION

5 4. This Petition to Revoke Probation is brought before the Board of Vocational Nursing  
6 and Psychiatric Technicians (Board), Department of Consumer Affairs, under the authority of the  
7 following laws. All section references are to the Business and Professions Code unless otherwise  
8 indicated.

#### 9 FIRST CAUSE TO REVOKE PROBATION

10 (Compliance with Probation Program and Quarterly Reporting Requirements)

11 5. At all times after the effective date of Respondent's probation, Condition 2 stated:

##### 12 **Compliance with Probation Program and Quarterly Report Requirements.**

13 Respondent shall fully comply with the terms and conditions of the probation established  
14 by the Board, and shall cooperate with the representatives of the Board in its monitoring  
and investigation of the Respondent's compliance with the Probation Program.

15 Respondent shall submit quarterly reports, under penalty of perjury, in a form  
16 required by the board. The reports shall certify and document compliance with all the  
conditions of probation.

17 6. Respondent's probation is subject to revocation because she failed to comply with  
18 Probation Condition 2. Specifically, Respondent failed to cooperate with the Board's  
19 representatives in the monitoring of her compliance with the terms and conditions of probation.

#### 20 SECOND CAUSE TO REVOKE PROBATION

21 (Notification to Employer(s))

22 7. At all times after the effective date of Respondent's probation, Condition 5 stated:

##### 23 **Notification to Employer(s).** When currently employed or applying for employment

24 in any capacity in any health care profession, Respondent shall notify her employer of the  
25 probationary status of Respondent's license. This notification to the Respondent's current  
26 health care employer shall occur no later than the effective date of the Decision.  
27 Respondent shall notify any prospective health care employer of her probationary status  
with the Board, prior to accepting such employment. This notification shall be by  
28 providing the employer or prospective employer with a copy of the Accusation and  
Disciplinary Decision of the Board.

1 The Health Care Profession includes, but is not limited to: Licensed Vocational  
2 Nurse, Psychiatric Technician, Registered Nurse, Medical Assistant, Paramedic,  
Emergency Medical Technician, Certified Nursing Assistant, Home Health Aide, and all  
other ancillary technical health care positions.

3 Respondent shall cause each health care employer to submit quarterly reports to the  
4 Board. The reports shall be on a form provided by the Board, shall include a performance  
evaluation and such other information as may be required by the Board.

5 Respondent shall notify the Board, in writing, within five (5) days of any change in  
6 employment status. Respondent shall notify the Board, in writing, if she is terminated from  
any nursing or health care related employment with a full explanation of the circumstances  
7 surrounding the termination.

8 8. Respondent's probation is subject to revocation because she failed to  
9 comply with Probation Condition 5. Specifically, Respondent failed to ensure that her part-time  
10 employer, Around the Clock Nurse Registry (Around the Clock) submitted a *Work*  
11 *Performance Evaluation* form on her behalf from April 2009, through January 2010. Respondent  
12 was notified via correspondence dated April 1, 2009, that it is her responsibility to ensure that a  
13 *Work Performance Evaluation* was completed and submitted in a timely manner. In addition,  
14 Respondent failed to notify the Board, in writing, within five (5) days of a change in employment  
15 status. Respondent's correspondence dated September 30, 2010 indicates that she has not worked  
16 for Around the Clock since January 31, 2010, and failed to notify the Board as required.

### 17 THIRD CAUSE TO REVOKE PROBATION

#### 18 (Abstain from Controlled Substances)

19 9. At all times after the effective date of Respondent's probation, Condition 14 stated:

20 **Abstain From Controlled Substances.** Respondent shall completely abstain from  
21 the personal use or possession of controlled substances, as defined in the California  
22 Uniform Controlled Substances Act, and dangerous drugs as defined in Section 4021 and  
4022 of the Business and Professions Code, except when lawfully prescribed by a licensed  
practitioner for a bona fide illness.

23 10. Respondent's probation is subject to revocation because she failed to  
24 comply with Probation Condition 14. Specifically, Respondent failed to abstain from controlled  
25 substances as required. The Board received a positive result for a drug test taken on April 6,  
26 2010 for Ethanol/Codeine/Morphine. A review of her April - June 2010 *Quarterly Written*  
27 *Report* fails to list any prescription medication information as required. To the question,  
28 "Are you currently taking prescription medications?" Respondent answered "no" and listed the

1 sobriety date for drugs as "3/9/07." In her correspondence dated October 4, 2010, Respondent  
2 wrote that she mistakenly took Tylenol with Codeine for a headache received after her April 6,  
3 2010 relapse.

4 FOURTH CAUSE TO REVOKE PROBATION

5 (Abstain from Use of Alcohol)

6 11. At all times after the effective date of Respondent's probation, Condition 15 stated:

7 **Abstain From Use of Alcohol.** Respondent shall completely abstain from the  
8 use of alcoholic beverages during the period of probation.

9 12. Respondent's probation is subject to revocation because she failed to comply with  
10 Probation Condition 15. Specifically, Respondent failed to abstain from alcohol as required. She  
11 admitted to consuming alcohol and tested positive for alcohol on April 6, 2010. Respondent also  
12 admitted to consuming alcohol on or about September 10, 2010.

13 FIFTH CAUSE TO REVOKE PROBATION

14 (Submit Biological Fluid Samples)

15 13. At all times after the effective date of Respondent's probation, Condition 16 stated:

16 **Submit Biological Fluid Samples.** Respondent shall immediately submit to  
17 biological fluid testing, at Respondent's cost, upon request by the Board, or its designee.  
18 There will be no confidentiality in test results; positive test results will be immediately  
19 reported to the Board, and the Respondent's current employer.

19 14. Respondent's probation is subject to revocation because she failed to comply with  
20 Probation Condition 16. Specifically, Respondent failed to submit to biological fluid testing  
21 (BFT) to document her abstinence from alcohol and illegal drugs as required. The Board  
22 previously approved The Permanente Medical Group, Inc. as her BFT provider and directed her  
23 to switch to one (1) of the Board's three (3) approved BFT providers via correspondence dated  
24 April 15, 2010, no later than April 30, 2010. Respondent failed to respond to the Board.

25 After her second relapse, Respondent was directed to enroll with Pharmatech Laboratories &  
26 Diagnostics Inc. by October 29, 2010, which she did. However, Respondent was not tested to the  
27 Board's standards from May 1, 2010 through September 28, 2010.

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14

## 15

16  
17  
18

19  
20  
21  
22

23

24

25

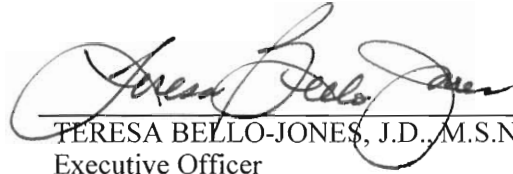
26

27

28

- 1           2.     Revoking or suspending Vocational Nurse License No. VN 147359, issued to  
2 Respondent; and  
3           3.     Taking such other and further action as deemed necessary and proper.  
4

5 DATED: January 19, 2011.



TERESA BELLO-JONES, J.D., M.S.N., R.N.  
Executive Officer  
Board of Vocational Nursing and Psychiatric Technicians  
Department of Consumer Affairs  
State of California  
*Complainant*

9  
10 SF2010900615  
11 CR: 01/10/11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **Exhibit A**

### **Decision and Order**

**Board of Vocational Nursing and Psychiatric Technicians Case No. VN-2006-1606**

1 BEFORE THE  
2 DEPARTMENT OF CONSUMER AFFAIRS  
3 BUREAU OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
4 STATE OF CALIFORNIA

5 In the Matter of the Accusation  
6 Against:

Case No. VN-2006-1606

7 JUANITA BUITRAGO  
8 775 Sweeney Street  
9 San Francisco, CA 94136

Vocational Nurse License No.  
VN 147359

Respondent.

11 DECISION

12  
13 The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the  
14 Director of the Department of Consumer Affairs<sup>1</sup> as the final Decision in the above-entitled matter.  
15

16  
17 This Decision shall become effective on Sept. 27, 2008

18 IT IS SO ORDERED this 11 day of 2008 August.  
19

20  
21 

22 PATRICIA HARRIS  
23 Deputy Director, Board/Bureau Support  
24 Department of Consumer Affairs  
25  
26  
27

28 <sup>1</sup>Pursuant to Business and Professions Code section 101.1(b), on July 1, 2008, the director became vested with the duties, powers, purposes, responsibilities, and jurisdiction of the Board of Vocational Nursing and Psychiatric Technicians.



1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 WILBERT E. BENNETT  
Supervising Deputy Attorney General  
3 CAROL S. ROMEO, State Bar No. 124910  
Deputy Attorney General  
4 1515 Clay Street, 20<sup>th</sup> Floor  
P.O. Box 70550  
5 Oakland, CA 94612-0550  
Telephone: (510) 622-2141  
6 Facsimile: (510) 622-2270

7 Attorneys for Complainant

8 **BEFORE THE**  
9 **BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 JUANITA BUITRAGO  
775 Sweeney Street  
13 San Francisco, California 94136  
Vocational Nurse License No. VN 147359

14 Respondent.  
15

Case No. VN-2006-1606

OAH No.

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16  
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the  
18 above-entitled proceedings that the following matters are true:

19 PARTIES

20 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) is the Executive  
21 Officer of the Board of Vocational Nursing and Psychiatric Technicians. She brought this action  
22 solely in her official capacity and is represented in this matter by Edmund G. Brown Jr., Attorney  
23 General of the State of California, by Carol S. Romeo, Deputy Attorney General.

24 2. Juanita Buitrago (Respondent) is representing herself in this proceeding  
25 and has chosen not to exercise her right to be represented by counsel.

26 3. On or about November 30, 1990, the Board of Vocational Nursing and  
27 Psychiatric Technicians issued Vocational Nurse License No. VN 147359 to Juanita Buitrago

28 //

1 (Respondent). The Vocational Nurse License was in full force and effect at all times relevant to  
2 the charges brought herein and will expire on November 30, 2009, unless renewed.

3 BOARD SUNSET

4 4. The parties understand and agree that, pursuant to Business and  
5 Professions Code sections 101.1(b) and 150, if the Board becomes inoperative or is repealed, the  
6 Department of Consumer Affairs shall succeed to and is vested with all the duties, powers,  
7 purposes, responsibilities, and jurisdiction not otherwise repealed or made inoperative of that  
8 board and its executive officer; that the department is under the control of the Director of  
9 Consumer Affairs; and that any reference to the inoperative or repealed Board in this stipulation  
10 and disciplinary order shall be understood to mean the Director of Consumer Affairs.

11 JURISDICTION

12 5. Accusation No. VN-2006-1606 was filed before the Board of Vocational  
13 Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs, and is currently  
14 pending against Respondent. The Accusation and all other statutorily required documents were  
15 properly served on Respondent on September 20, 2007. Respondent timely filed her Notice of  
16 Defense contesting the Accusation. A copy of Accusation No. VN-2006-1606 is attached as  
17 Exhibit A and incorporated herein by reference.

18 ADVISEMENT AND WAIVERS

19 6. Respondent has carefully read, and understands the charges and allegations  
20 in Accusation No. VN-2006-1606. Respondent has also carefully read, and understands the  
21 effects of this Stipulated Settlement and Disciplinary Order.

22 7. Respondent is fully aware of her legal rights in this matter, including the  
23 right to a hearing on the charges and allegations in the Accusation; the right to be represented by  
24 counsel at her own expense; the right to confront and cross-examine the witnesses against her;  
25 the right to present evidence and to testify on her own behalf; the right to the issuance of  
26 subpoenas to compel the attendance of witnesses and the production of documents; the right to  
27 reconsideration and court review of an adverse decision; and all other rights accorded by the  
28 California Administrative Procedure Act and other applicable laws.

1                   8.       Respondent voluntarily, knowingly, and intelligently waives and gives up  
2 each and every right set forth above.

3   CULPABILITY

4                   9.       Respondent admits the truth of each and every charge and allegation in  
5 Accusation No. VN-2006-1606.

6                   10.      Respondent agrees that her Vocational Nurse License is subject to  
7 discipline and she agrees to be bound by the imposition of discipline by the Board of Vocational  
8 Nursing and Psychiatric Technicians, as set forth in the Disciplinary Order below.

9   CONTINGENCY

10                  11.      This stipulation shall be subject to approval by the Board of Vocational  
11 Nursing and Psychiatric Technicians. Respondent understands and agrees that counsel for  
12 Complainant and the staff of the Board of Vocational Nursing and Psychiatric Technicians, may  
13 communicate directly with the Board, regarding this stipulation and settlement, without notice to  
14 or participation by Respondent. By signing the stipulation, Respondent understands and agrees  
15 that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the  
16 Board considers and acts upon it. If the Board of Vocational Nursing and Psychiatric  
17 Technicians fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement  
18 and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be  
19 inadmissible in any legal action between the parties, and the Board of Vocational Nursing and  
20 Psychiatric Technicians, shall not be disqualified from further action by having considered this  
21 matter.

22                  12.      The parties understand and agree that facsimile copies of this Stipulated  
23 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same  
24 force and effect as the originals.

25                  13.      In consideration of the foregoing admissions and stipulations, the parties  
26 agree that the Board of Vocational Nursing and Psychiatric Technicians may, without further  
27 notice or formal proceeding, issue and enter the following Disciplinary Order:

28 //

1 **DISCIPLINARY ORDER**

2 IT IS HEREBY ORDERED that Vocational Nurse License No. VN 147359 issued  
3 to Juanita Buitrago (Respondent) is revoked. However, the revocation is stayed and Respondent  
4 is placed on probation for three (3) years on the following terms and conditions.

5 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws,  
6 including all statutes and regulations governing the license. Respondent shall submit, in writing,  
7 a full and detailed account of any and all violations of the law to the Board, within five (5) days  
8 of occurrence. To ensure compliance with this term, respondent shall submit two (2) completed  
9 fingerprint cards and the applicable fingerprint processing fees to the Board, within thirty (30)  
10 days of the effective date of the decision, unless the Board determines that fingerprint cards were  
11 already submitted by Respondent as part of her licensure application process effective July 1,  
12 1996. Respondent shall also submit a recent 2" x 2" photograph of herself within thirty (30) days  
13 of the effective date of the decision.

14 2. **Compliance With Probation Program And Quarterly Report**  
15 **Requirements.** Respondent shall fully comply with terms and conditions of the probation  
16 established by the Board, and shall cooperate with the representatives of the Board, in its  
17 monitoring and investigation of the Respondent's compliance with the Probation Program.

18 Respondent shall submit quarterly reports, under penalty of perjury, in a form  
19 required by the Board. The reports shall certify and document compliance with all the conditions  
20 of probation.

21 3. **Notification of Address And Telephone Number Change(s).**  
22 Respondent shall notify the Board, within five (5) days of a change of residence or mailing  
23 address, of her new address and any change in her work and/or home telephone numbers.

24 4. **Notification of Residency or Practice Outside of State.** Respondent  
25 shall notify the Board, in writing, within five (5) days, if she leaves California to reside or  
26 practice in another state.

27 Respondent shall notify the Board, in writing, within five (5) days, upon her return  
28 to California.

1           The period of probation shall not run during the time Respondent is residing or  
2 practicing outside California.

3           **5. Notification to Employer(s).** When currently employed or applying for  
4 employment in any capacity in any health care profession, Respondent shall notify her employer  
5 of the probationary status of Respondent's license. This notification to the Respondent's current  
6 health care employer shall occur no later than the effective date of the Decision. Respondent  
7 shall notify any prospective health care employer of her probationary status with the Board, prior  
8 to accepting such employment. This notification shall be by providing the employer or  
9 prospective employer with a copy of the Accusation and Disciplinary Decision of the Board.

10           The Health Care Profession includes, but is not limited to: Licensed Vocational  
11 Nurse, Psychiatric Technician, Registered Nurse, Medical Assistant, Paramedic, Emergency  
12 Medical Technician, Certified Nursing Assistant, Home Health Aide, and all other ancillary  
13 technical health care positions.

14           Respondent shall cause each health care employer to submit quarterly reports to  
15 the Board. The reports shall be on a form provided by the Board, shall include a performance  
16 evaluation and such other information as may be required by the Board.

17           Respondent shall notify the Board, in writing, within five (5) days of any change  
18 in employment status. Respondent shall notify the Board, in writing, if she is terminated from  
19 any nursing or health care related employment with a full explanation of the circumstances  
20 surrounding the termination.

21           **6. Interviews/meetings With Board Representative(s).** Respondent,  
22 during the period of probation, shall appear in person at interviews/meetings as directed by the  
23 Board, or its designated representatives.

24           **7. Employment Requirements And Limitations.** During probation,  
25 Respondent shall work in her licensed capacity in the State of California. This practice shall  
26 consist of no less than six (6) continuous months and of no less than twenty (20) hours per week.

27           While on probation, Respondent shall be allowed to work for **STAT Nursing**  
28 **Services only.** Furthermore, any change of employment must be approved by Respondent's

1 probation monitor, in writing.

2                   8.       **Supervision Requirements.** Respondent shall obtain prior approval from  
3 the Board, before commencing any employment, regarding the level of supervision provided to  
4 Respondent while employed as a licensed vocational nurse.

5                   Respondent shall not function as a charge nurse (i.e., work in any healthcare  
6 setting as the person who oversees or directs licensed vocational nurses, psychiatric technicians,  
7 certified nursing assistants or unlicensed assistive personnel) during the period of probation  
8 except as approved, in writing, by the Board.

9                   9.       **Completion of Educational Course(s).** Respondent, at her own expense,  
10 shall enroll and successfully complete a course(s) substantially related to the violation(s) no later  
11 than the end of the first year of probation; or Respondent shall be suspended from practice, until  
12 she has enrolled in and has successfully completed the specified coursework.

13                   The coursework shall be in addition to that required for license renewal. The  
14 Board shall notify Respondent of the course content and number of contact hours required.  
15 Within thirty (30) days of the Board's written notification of assigned coursework, Respondent  
16 shall submit a written plan to comply with this requirement. The Board shall approve such plan  
17 prior to enrollment in any course of study.

18                   Upon successful completion of the course, Respondent shall cause the instructor  
19 to furnish proof to the Board within thirty (30) days of course completion.

20                   10.       **Maintenance of Valid License.** Respondent shall, at all times while on  
21 probation, maintain an active current license with the Board, including any period during which  
22 suspension or probation is tolled.

23                   Should respondent's license, by operation of law or otherwise, expire, upon  
24 renewal or reinstatement respondent's license shall be subject to any and all terms of this  
25 probation not previously satisfied.

26                   11.       **Cost Recovery Requirements.** Respondent shall pay to the Board,  
27 pursuant to Business and Professions Code Section 125.3 the costs of investigation and  
28 enforcement in this matter in the amount of \$2,000.00 (two thousand dollars). Respondent shall

1 be permitted to pay these costs in a payment plan approved by the Board, with the payments to be  
2 completed no later than three months prior to the end of the probation term. Failure to complete  
3 payment of cost recovery within this time frame shall constitute a violation of probation which  
4 may subject Respondent's license to outright revocation.

5 The Board may conditionally renew or reinstate, for a maximum of one year, the  
6 license of any respondent who demonstrates financial hardship. Respondent shall enter into a  
7 formal agreement with the Board, to reimburse the unpaid costs within that one year period.

8 Except as provided above, the Board shall not renew or reinstate the license of any  
9 Respondent who has failed to pay all the costs as directed in a Decision.

10 12. **Violation of Probation.** If Respondent violates the conditions of her  
11 probation, the Board, after giving Respondent notice and an opportunity to be heard, may set  
12 aside the stay order and impose the stayed revocation of the Respondent's license. If during the  
13 period of probation, an accusation or petition to revoke has been filed against the Respondent's  
14 license or the Attorney General's Office has been requested to prepare an accusation or petition  
15 to revoke probation against the Respondent's license, the probationary period shall automatically  
16 be extended and shall not expire until the accusation or petition has been acted upon by the  
17 Board. Upon successful completion of probation, the Respondent's license will be fully restored.

18 13. **Rehabilitation Program.** Within thirty (30) days of the effective date of  
19 the Decision, Respondent shall enter a rehabilitation and monitoring program specified by the  
20 Board. Respondent shall successfully complete such treatment contract as may be recommended  
21 by the program and approved by the Board.

22 Components of the treatment contract shall be relevant to the violation and to the  
23 respondent's current status in recovery or rehabilitation. The components may include, but are  
24 not limited to: restrictions on practice and work setting, random bodily fluid testing, abstention  
25 from drugs and alcohol, use of work site monitors, participation in chemical dependency  
26 rehabilitation programs or groups, psychotherapy, counseling, psychiatric evaluations and other  
27 appropriate rehabilitation or monitoring programs. The cost for participation in this program  
28 shall be paid by Respondent.

1                   14.     **Abstain From Controlled Substances.** Respondent shall completely  
2 abstain from the personal use or possession of controlled substances, as defined in the California  
3 Uniform Controlled Substances Act, and dangerous drugs as defined in Section 4021 and 4022 of  
4 the Business and Professions Code, except when lawfully prescribed by a licensed practitioner  
5 for a bona fide illness.

6                   15.     **Abstain From Use of Alcohol.** Respondent shall completely abstain from  
7 the use of alcoholic beverages during the period of probation.

8                   16.     **Submit Biological Fluid Samples.** Respondent shall immediately submit  
9 to biological fluid testing, at Respondent's cost, upon request by the Board, or its designee.  
10 There will be no confidentiality in test results; positive test results will be immediately reported  
11 to the Board, and the Respondent's current employer.

12                                   ACCEPTANCE

13                   I have carefully read the Stipulated Settlement and Disciplinary Order. I  
14 understand the stipulation and the effect it will have on my Vocational Nurse License. I enter  
15 into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently,  
16 and agree to be bound by the Decision and Order of the Board of Vocational Nursing and  
17 Psychiatric Technicians.

18 DATED: 6-26-08.

19  
20   
21 JUANITA BUITRAGO  
Respondent

22 //

23 //

24 //

25 //

26 //

27 //

28 //



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Vocational Nursing and Psychiatric Technicians.

DATED: 7/11/08

EDMUND G. BROWN JR., Attorney General  
of the State of California

WILBERT E. BENNETT  
Supervising Deputy Attorney General

Carol S. Romeo  
CAROL S. ROMEO  
Deputy Attorney General  
Attorneys for Complainant

Attachment:  
Accusation No. VN-2006-1606

## **Exhibit A**

**Accusation Case No. VN-2006-1606**

SEP 20 2007

Board of Vocational Nursing  
and Psychiatric Technicians

EDMUND G. BROWN JR., Attorney General  
of the State of California  
WILBERT BENNETT  
Supervising Deputy Attorney General  
CAROL S. ROMEO, State Bar No. 124910  
Deputy Attorney General  
California Department of Justice  
1515 Clay Street, 20<sup>th</sup> Floor  
P.O. Box 70550  
Oakland, CA 94612-0550  
Telephone: (510) 622-2141  
Facsimile: (510) 622-2270

Attorneys for Complainant

BEFORE THE  
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. VN-2006-1606

JUANITA BUITRAGO  
775 Sweeney Street  
San Francisco, California 94136

ACCUSATION

Vocational Nurse License No. VN 147359

Respondent.

Complainant alleges:

PARTIES

1. Teresa Bello-Jones, J.D., M.P.H., R.N. (Complainant) brings this  
Accusation solely in her official capacity as the Executive Officer of the Board of Vocational  
Nursing and Psychiatric Technicians.

2. On or about January 30, 1990, the Board of Vocational Nursing and  
Psychiatric Technicians issued Vocational Nurse License Number VN 147359 to JUANITA  
BUITRAGO (Respondent). The Vocational Nurse License was in full force and effect at all  
times relevant to the charges brought herein and will expire on November 30, 2007, unless  
renewed.

//

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9

2  
3  
4

## 5

6  
7  
8  
9

0  
1  
2  
3  
4

557

;

1

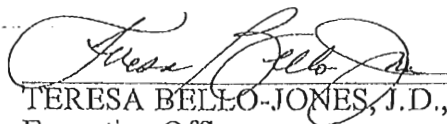
1 Residential Rehabilitation Program at MPI Chemical Dependency Treatment Services (Alta  
2 Bates Summit Medical Center) in Oakland, California for assistance with her chemical abuse  
3 problem, to wit: Alcoholism. On or about March 2007, Respondent admitted that she was an  
4 Alcoholic and that this had caused significant problems in her personal life, including her  
5 employment.

6 PRAYER

7 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
8 alleged, and that following the hearing, the Board issue a decision:

- 9 1. Revoking or suspending Vocational Nurse License Number VN 147359,  
10 issued to JUANITA BUITRAGO;  
11 2. Ordering JUANITA BUITRAGO to pay the Board the reasonable costs of  
12 the investigation and enforcement of this case, pursuant to Business and Professions Code  
13 section 125.3;  
14 3. Taking such other and further action as deemed necessary and proper.  
15

16 DATED: September 20, 2007

17  
18 

19 TERESA BELLO-JONES, J.D., M.P.H., R.N.  
20 Executive Officer  
21 Board of Vocational Nursing and Psychiatric Technicians  
22 State of California  
23 Complainant  
24

25  
26  
27  
28  
03595110-SF2007401948  
CSR: 09.10.07